

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK- - - - - X  
UNITED STATES OF AMERICA :

- v. - :

ZUBEARU BETTIS and  
STEPHEN ADAMS,

Defendants.

: SEALED INDICTMENT

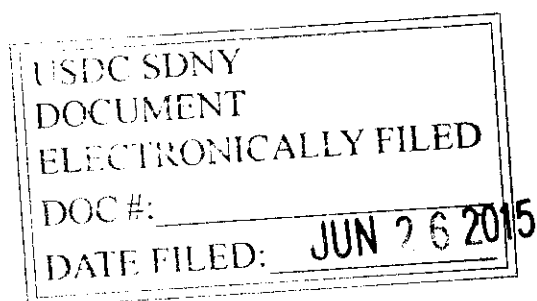
: 15 Cr.

**15 CRIM 410**- - - - - X  
COUNT ONE

The Grand Jury charges:

1. On or about June 15 and 16, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ZUBEARU BETTIS and STEPHEN ADAMS agreed to commit a robbery of an individual involved in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)



COUNT TWO

The Grand Jury further charges:

2. On or about June 15 and 16, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged in the vicinity of 2251 7th Avenue, in Manhattan, New York.

(Title 18, United States Code, Section 924(c)(1)(A)(ii)-(iii) and 2 .)

FORFEITURE ALLEGATION AS TO COUNT ONE

3. As a result of committing the robbery offense alleged in Count One of this Indictment, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count One of this Indictment, including but not limited to the proceeds obtained as a result of the offense alleged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

4. As a result of committing the firearms offense alleged in Count Two of this Indictment, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461, any firearm or ammunition involved in or used in the violation alleged in Count Two of this Indictment.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p) to seek forfeiture of any other

property of said defendants up to the value of the above  
forfeitable property.

(Title 18, United States Code, Sections 981 and 924, and Title  
28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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(Title 18, United States Code, Sections  
924(c), 1951, and 2)

PREET BHARARA

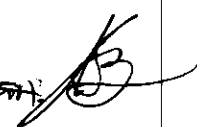
United States Attorney.

A TRUE BILL



Foreperson.

June 26, 2015

Filed Sealed Indictment. Case assigned to Judge Freeman.   
U.S.M.J. Debra Freeman